

**From:** [Baumgarten, Gary](#)  
**To:** [Sanchez, Carlos](#); [Gilmore, Cathy](#)  
**Cc:** [Meyer, John](#)  
**Subject:** Recontamination of CERCLA cleanups as a result of NPDES discharges  
**Date:** Thursday, April 24, 2014 2:35:57 PM  
**Attachments:** [Potential Current R6 NPL Sediment Sites.xlsx](#)

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Carlos and Cathy,

I am working with folks from our water division to identify NPL sites that could potentially be recontaminated as a result of NPDES discharges upstream of the NPL site. This work is in response to a HQ CERCLA/CWA collaboration call that occurred a couple of weeks ago. More details are in an April 1 e-mail that Pam Phillips forwarded to you all.

I looked through the Site Status Summaries to identify NPL sites that either have contaminated sediments or have the potential to have contaminated sediments. Please take a look at the attached list and let me know if I've incorrectly included a site or have left one off the list.

I will be working with Jeff Danielson to put together a GIS map identifying the NPL sites we are referring to as "sediment" sites. This map will be shared with the Water Division folks.

Please let me know if you have any questions.

Thanks,  
Gary

**Here is the information that was sent by Pam in her April 1 email.**

**From:** Honker, William  
**Sent:** Tuesday, April 01, 2014 5:00 PM  
**To:** Edlund, Carl; Phillips, Pam  
**Cc:** Garcia, David; Brown, Jamesr; Taylor, Patricia-A; Hosch, Claudia; Kaspar, Paul; Larsen, Brent; Watson, Jane; Crocker, Philip; Saunders, Jerry  
**Subject:** CERCLA/CWA Collaboration

I listened in on the CERCLA/CWA collaboration call today. Several attachments which I'm forwarding. Main concern is recontamination of CERCLA cleanups as a result of NPDES discharges. Poster cases are Gowanus Canal in NY and Lower Duwamish Waterway in Seattle area. Some points from the call:

- HQ will proceed with memo from Mathy/Nancy/Cynthia to RAs (draft attached). Memo may request each Region to identify sites that would benefit from collaboration.
- HQ did a pull of potential sites (fourth attachment) which includes Bayou Bonfouca, Lavaca Bay, and Bailey for R6.



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- OW considering condition in MSGP which would require industries discharging above CERCLA sites to get individual permits (or go through a review by the Region).
- OW also considering drafting guidance to states encouraging them to use sediment data in assessment/listing decisions.

Carl/Pam – I know we're coordinating on sites like SJWP and Tar Creek, but do you know of any recontamination issues with completed sites?

Jim/Patty – is it possible to do GIS analysis to identify NPDES dischargers upstream of CERCLA sites and see if there's anything they're discharging that could recontaminate the CERCLA sites?

Claudia/Brent/Paul – are you aware of any recontamination issues that have come up in NPDES permitting decisions?

Bill

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